

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

**PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF
SUCCESSOR-CUSTODIAN DOCUMENTS AND RELEVANT SOURCE CODE**

Pursuant to Federal Rule of Civil Procedure 37 and Local Rule 37(A), Plaintiffs, through their undersigned counsel, hereby move to compel Defendant Google to: (1) produce documents from the files of successor custodians in key positions at Google between October 2020 and January 2023; and (2) produce source code and related explanatory documents concerning the algorithms and other computer code utilized by Google's ad tech tools that are at the heart of the amended complaint, responsive to Plaintiffs' Requests for Production Nos. 39-43, served on March 27, 2023. The grounds for the motion are fully set forth in the accompanying memorandum of law.

Dated: May 26, 2023

Respectfully submitted,

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